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February 27, 2009

Marlene H. Dortch Office of the Secretary Federal Communications Commission, 445 12th Street, SW Suite TW-A325 Washington, DC 20554

Re:

New Hope Telephone Cooperative Long Distance, Inc. d/b/a Ice Media Group's Annual 47 C.F.R. § 64.2009(c) Customer Proprietary Network Information (CPNI) Compliance Certification

EB Docket No. 06-36

Dear Ms. Dortch:

On behalf of New Hope Telephone Cooperative Long Distance, Inc. d/b/a Ice Media Group ("New Hope Long Distance"), please find attached the annual CPNI Compliance Certification ("Certification") for New Hope Long Distance for the year 2008 in EB Docket No. 06-36, which has been filed electronically via the Federal Communication Commission's ("Commission") Electronic Comment Filing System on this date. Simultaneously, New Hope Long Distance has also provided one (1) copy of the Certification to Best Copy and Printing, Inc., via electronic mail at FCC@BCPIWEB.COM, as required under the Commission's Public Notice, DA 09-9 (released January 7, 2009).

Please contact me if you have any questions regarding this matter.

Very truly yours,

WILKERSON & BRYAN, P.C.

Dane W. Billingsley

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### Enclosure

cc:

Tom Wing Best Copy and Printing, Inc.

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

### **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2008
Date filed: February <u>31</u> , 2009
Name of company covered by this certification: New Hope Telephone Cooperative Long Distance, Inc. d/b/a Ic Media Group
Form 499 Filer ID:
Name of signatory:
Title of signatory:Secretary
In response to the Federal Communications Commission's ("Commission") Public Notice, DA 09-9 (released January 7, 2009), New Hope Telephone Cooperative Long Distance, Inc. d/b/a Ice Media Group, states as follows:
I, <u>Jim Duncan</u> , certify that I am an officer of the company named above, and acting as ar agent of the company, that I have personal knowledge that the company has established operating procedures tha are adequate to ensure compliance with the Commission's Customer Proprietary Network Information ("CPNI" rules, as set forth in 47 C.F.R. § 64.2001 <i>et seq</i> .
Attached to this certification is an accompanying statement explaining how the company's procedures

ensure that the company is in compliance with the requirements set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI, including unauthorized access to or disclosure of CPNI.

Signed

# Before the Federal Communications Commission Washington, D.C. 20554

## ANNUAL 47 C.F.R. § 64.2009(e) CPNI COMPLIANCE STATEMENT OF

### NEW HOPE TELEPHONE COOPERATIVE LONG DISTANCE, INC. D/B/A ICE MEDIA GROUP

#### EB Docket No. 06-36

In compliance with the annual certification required under 47 C.F.R. § 64.2009(e), the undersigned officer of New Hope Telephone Cooperative Long Distance, Inc. d/b/a Ice Media Group (hereinafter, "New Hope Long Distance") files the following statement of compliance with the requirements set forth in 47 C.F.R. § 64.2001 *et seq.* on behalf of New Hope Long Distance:

- 1. I have personal knowledge that New Hope Long Distance has implemented a system by which the status of a customer's Customer Proprietary Network Information ("CPNI") approval can be clearly established prior to the use of CPNI.
- 2. I have personal knowledge that New Hope Long Distance obtains written approval for the use of its customers' CPNI and that New Hope Long Distance has notified its customers of their right to restrict New Hope Long Distance's use of, disclosure of and access to their CPNI prior to obtaining such written approval.
- 3. I have personal knowledge that New Hope Long Distance has trained its personnel who may use, disclose or have access to CPNI as to when such personnel are and are not authorized to use CPNI in accordance with the requirements of 47 C.F.R. § 64.2001 *et seq.* and that New Hope Long Distance has an express disciplinary process in place to deal with breaches of CPNI.
- 4. I have personal knowledge that New Hope Long Distance implemented procedures to safeguard the disclosure of its customers' CPNI, including a customer password and backup authentication system, notification of customer account changes and notification of security breaches of customer CPNI to law enforcement agencies.
- 5. I have personal knowledge that New Hope Long Distance maintains records of its own and its affiliates' sales and marketing campaigns that use customer CPNI and further maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to customer CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. New Hope Long Distance retains all such records for a minimum period of one (1) year.

- 6. I have personal knowledge that New Hope Long Distance has established a supervisory review process regarding New Hope Long Distance's compliance with outbound marketing situations and that New Hope Long Distance maintains records of such compliance for a minimum period of one (1) year. New Hope Long Distance's sales personnel obtain supervisory approval of any proposed outbound marketing request for customer approval regarding its CPNI, and a process ensures that opt-out elections are recorded and followed.
- 7. I have personal knowledge that New Hope Long Distance has not received any information with regard to the processes pretexters are using to attempt to access CPNI.

I hereby certify that the foregoing statements are true and correct.

Executed on this 274 day of February, 2009.

NEW HOPE TELEPHONE COOPERATIVE LONG DISTANCE, INC. D/B/A ICE MEDIA GROUP

 $\mathbf{RV}$ 

Printed: Jim Duncan

As Its: Secretary